

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JANE DOE #1, *et al.*,

Plaintiffs,

V.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et al.*,

Defendants.

Case No.: 3:25-cv-00317

[PROPOSED] PROTECTIVE ORDER

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Upon consideration of **Plaintiffs' Motion for a Protective Order**, and the entire record herein, IT IS ORDERED that the motion is GRANTED.

IT IS HEREBY ORDERED THAT:

1. Any materials filed with the Court that contain Plaintiff's name or any identifying information must be redacted and/or filed under seal.
2. Defendants' counsel may not share any information about Plaintiffs' identity beyond what is reasonably necessary for the litigation and to comply with this court's orders;
3. The parties are prohibited from using the protected information for any purpose outside of this litigation;
4. The parties are prohibited from disclosing the identity of plaintiff for purposes of detention or removal for the pendency of this litigation or until further order of the court;
5. Defendants are enjoined from detaining Plaintiff during the pendency of this litigation or until further order of this Court.

SO ORDERED this _____ day of _____, 2025.

HON. JUDGE WILLIAM CONLEY
U.S. District Judge
Western District of Wisconsin